

IN THE SUPREME COURT OF THE STATE OF NEVADA

NAUTILUS INSURANCE
COMPANY,

Appellant,

vs.

ACCESS MEDICAL, LLC; ROBERT
CLARK WOOD, II; and FLOURNOY
MANAGEMENT, LLC,

Respondents.

No. 75190 Electronically Filed
Dec 20 2019 09:25 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

**RESPONDENT FLOURNOY MANAGEMENT, LLC's MOTION TO
EXTEND TIME TO FILE ANSWERING BRIEF**

In accordance with NRAP Rules 27 and 31, Respondent Flournoy Management, LLC ("Flournoy"), appearing through counsel James E. Harper, hereby submits this, its Motion to Extend Time to File Answering Brief.

Flournoy wishes to receive the extension in order to coordinate briefing with its Co-Respondents Access Medical, LLC and Robert Clark Wood, II ("Access and Wood"). Flournoy's interests and legal arguments are closely aligned with Access and Wood's, but not always identical. Flournoy is represented by separate counsel.

The Court granted Access and Wood's Motion for Extension of Time to File Respondents' Response Brief on December 18, 2019. Access and Wood's Response Brief is currently due January 22, 2020.

A. **The Date the Brief is Due**

The opening brief is currently due today, **December 20, 2019**.

B. **The Number of Extensions of Time Previously Granted**

No previous extension of time has been made by Respondent Flournoy.

Therefore, no previous extension of time for Flournoy has been granted.

C. **Whether Any Previous Requests for Extensions of Time Have Been Denied or Denied in Part**

No previous requests for extension of time have been made.

D. **The Reasons or Grounds Why An Extension is Necessary**

Flournoy wishes to coordinate briefing with its Co-Respondents Access Medical, LLC and Robert Clark Wood, II (“Access and Wood”). Flournoy’s interests and legal arguments are closely aligned with Access and Wood’s, but not always identical. Flournoy is represented by separate counsel.

The Court granted Access and Wood’s Motion for Extension of Time to File Respondents’ Response Brief on December 18, 2019. Access and Wood’s Response Brief is currently due January 22, 2020. Flournoy seeks the same due date as its Co-Respondents Access and Wood.

E. **The Length of Extension Requested and Date Brief Would Become Due**

Flournoy requests a thirty-three-day extension to make its responding brief due the same day as Access and Wood's responding brief. Flournoy's answering brief would thus become due on **January 22, 2020**.

This motion is filed in good faith and supported by diligence and substantial need, as detailed above.

Dated this 20th day of December, 2019.

Respectfully submitted,
/s/ James E. Harper

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CERTIFICATE OF SERVICE

On December 20, 2019, I served the following parties through the Nevada Supreme Court's Electronic Filing Program with a true and correct copy of **RESPONDENT FLOURNOY MANAGEMENT, LLC's MOTION TO EXTEND TIME TO FILE ANSWERING BRIEF** pursuant to NRAP 25.

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